

STEPHANIE M. HINDS (CABN 154284)  
United States Attorney

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

UNITED STATES OF AMERICA,	)	CASE NO. CR 11-00683 BLF
	)	
Plaintiff,	)	<u>VIOLATIONS:</u>
	)	18 U.S.C. §§ 1030(b), 1030(a)(5)(A) and (c)(4)(G)(i)
v.	)	- Conspiracy to Commit Intentional Damage to a
	)	Protected Computer (Class A Misdemeanor);
CHRISTOPHER DOYON,	)	18 U.S.C. §§ 1030(a)(5)(A) and (c)(4)(G)(i) –
a/k/a "PLF," "Commander Adama," and	)	Intentional Damage to a Protected Computer (Class A
"Commander X,	)	Misdemeanor)
	)	
Defendant.	)	
	)	SAN JOSE VENUE

S U P E R S E D I N G I N F O R M A T I O N

The United States Attorney charges:

I N T R O D U C T O R Y A L L E G A T I O N S

At all times relevant to this Superseding Information:

1. The County of Santa Cruz, California ("Santa Cruz County" ), was located wholly within the Northern District of California. Santa Cruz County maintained a website on the internet through computer servers also located within the Northern District of California. This website allowed access to Santa Cruz County's government entities and programs, including Emergency Services, Law Enforcement, the Courts, Social Services, Agricultural Extension, Employment, Surplus Sales, Vendor Registration, and Construction Projects and Proposals. Santa Cruz County's website and computer servers were used in and affecting interstate and foreign commerce and communication.

2. The City of Santa Cruz ("Santa Cruz City") was located wholly within Santa Cruz

County. The Santa Cruz City Municipal Code ("the Municipal Code") was a codification of the general ordinances of Santa Cruz City. Section 6.36.010 of the Municipal Code, entitled "Camping Prohibited," contained restrictions and definitions on camping within Santa Cruz City. In response to the enforcement of Section 6.36.010, protesters occupied the Santa Cruz County Courthouse premises from approximately July 4, 2010, to October 2, 2010. Law enforcement officers from Santa Cruz County disbanded the protest and several protesters were charged with misdemeanors crimes in Santa Cruz County.

3. The People's Liberation Front, also known as PLF, was an online collective of individuals that was associated with collaborative hacking attacks motivated by political and social goals, often referred to as "hacktivism."

4. A Distributed Denial of Service ("DDoS") was a hacking attack that attempted to render a computer resource unavailable to its intended users. One common DDoS attack attempted to saturate the target computer or network with external communications requests, such that the target could not respond to legitimate traffic, or responded so slowly as to render the target effectively unavailable.

5. A High Orbit Ion Cannon ("HOIC") was an open source computer program that was originally designed as a network security and stability testing application, but which was also used as a tool by DDoS attackers. Attackers used HOIC to send extremely large amounts of packets or requests over a network in an attempt to overwhelm a target.

Distributed Denial of Service Attacks on the County of Santa Cruz, California:

6. In retribution for Santa Cruz City's enforcement of Section 6.36.010 of the Municipal Code, and Santa Cruz County's disbandment of the protest, the PLF coordinated and executed a DDoS attack against Santa Cruz County's computer servers using HOIC. The PLF referred to these coordinated attacks on Santa Cruz County as "Operation Peace Camp 2010."

COUNT ONE: (18 U.S.C. §§ 1030(b), 1030(a)(5)(A) and (c)(4)(G)(i) - Conspiracy to Commit Intentional Damage to a Protected Computer)

7. The factual allegations contained Paragraphs 1 through 6 are realleged and incorporated herein by reference as if set forth in full.

//

1           8.       On or about a date unknown but at least by December 12, 2010, and continuing to on or  
2 about December 16, 2010, in the Northern District of California and elsewhere, the defendant,

3                               CHRISTOPHER DOYON,  
4                               a/k/a "PLF," "Commander Adama," and  
5                               "Commander X,"

6 did knowingly conspire and agree with persons known and unknown, to commit Intentional Damage to a  
7 Protected Computer, in violation of 18 U.S.C. §§ 1030(a)(5)(A) and (c)(4)(G)(i), that is to commit a  
8 DDoS attack on Santa Cruz County's protected computers.

9           All in violation of Title 18, United States Code, Sections 1030(b), 1030(a)(5)(A) and  
10 (c)(4)(G)(i), a Class A Misdemeanor.

11 COUNT TWO: (18 U.S.C. §§ 1030(a)(5)(A) and (c)(4)(G)(i) – Intentional Damage to a Protected  
12 Computer)

13           9.       The factual allegations contained Paragraphs 1 through 6 are realleged and incorporated  
14 herein by reference as if set forth in full.

15           10.      On or about December 16, 2010, in the Northern District of California and elsewhere, the  
16 defendant,

17                               CHRISTOPHER DOYON,  
18                               a/k/a "PLF," "Commander Adama," and  
19                               "Commander X,"

20 knowingly caused the transmission of a program, information, code, and command, that is, HOIC, and,  
21 as a result of such conduct, intentionally caused damage without authorization to protected computers of  
22 Santa Cruz County.

23           All in violation of Title 18, United States Code, Sections 1030(a)(5)(A) and (c)(4)(G)(i), a Class  
24 A Misdemeanor.

25 DATED: 3/8/22

STEPHANIE M. HINDS  
United States Attorney

*Susan Knight*

\_\_\_\_\_  
SUSAN KNIGHT  
Assistant United States Attorney

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**

BY: ☐ COMPLAINT ☒ INFORMATION ☐ INDICTMENT  
☒ SUPERSEDING

**OFFENSE CHARGED**

COUNT ONE: (18 U.S.C. §§ 1030(b), 1030(a)(5)(A) and (c)(4)(G)(i) - Conspiracy to Commit Intentional Damage to a Protected Computer)

☐ Petty☐ Minor

COUNT TWO: (18 U.S.C. §§ 1030(a)(5)(A) and (c)(4)(G)(i) - Intentional Damage to a Protected Computer)

☒ Misdemeanor☐ Felony

PENALTY: Counts One and Two: 1 year imprisonment, max \$100,000 fine, 1 year of supervised release, \$25 special assessment

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

**DEFENDANT - U.S.**

Christopher Doyon

DISTRICT COURT NUMBER

CR 11-00683 -BLF

**PROCEEDING**

Name of Complainant Agency, or Person (&amp; Title, if any)

FBI

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. ATTORNEY ☐ DEFENSE

SHOW  
DOCKET NO.

☐ this prosecution relates to a pending case involving this same defendant

MAGISTRATE  
CASE NO.

☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person

Furnishing Information on this form Stephanie M. Hinds

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned)

Susan Knight

**DEFENDANT****IS NOT IN CUSTODY**

1) ☐ Has not been arrested, pending outcome this proceeding. If not detained give date any prior summons was served on above charges

2) ☐ Is a Fugitive

3) ☐ Is on Bail or Release from (show District)

**IS IN CUSTODY**

4) ☒ On this charge

5) ☐ On another conviction

☐ Federal ☐ State

6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

**DATE OF ARREST**

Month/Day/Year

Or... if Arresting Agency & Warrant were not

**DATE TRANSFERRED TO U.S. CUSTODY**

Month/Day/Year

☐ This report amends AO 257 previously submitted

**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**

☐ SUMMONS ☒ NO PROCESS\* ☐ WARRANT

Bail Amount: \_\_\_\_\_

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

\* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: \_\_\_\_\_ Before Judge: \_\_\_\_\_

Comments: